



DEPARTMENT OF GENERAL SERVICES

Isiah Leggett
County Executive

David E. Dise
Director

July 29, 2010

Ms. Françoise Carrier, Chair
Montgomery County Planning Board
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, MD 20910

Re: Public Hearing Draft – Wheaton Sector Plan
Executive Branch Comments

Dear Ms. Carrier:

The Executive Branch strongly supports the vision of high density, mixed-use town center development outlined in the Wheaton Sector Plan (the Plan), with its protection of surrounding neighborhoods and the accompanying grid network. We concur with the removal of the Overlay Zone as its removal is critical to redevelopment. Early in the planning process, Park and Planning sought and received from the Executive Branch and the Wheaton community a statement of goals for the Sector Plan update. We appreciate this early involvement and that staff has incorporated these goals. This planning process has been characterized by open communication and responsiveness throughout the frequent meetings and exchange of ideas with Executive Branch staff and the public.

The Plan provides the framework upon which redevelopment can occur. While Wheaton is not currently an office market, having sufficient zoning in place sets the stage for such development as environmental and transportation concerns make smart growth more attractive. Executive Branch staff has performed a detailed review of the Plan and is providing you with comments and other recommendations. Among these are certain general points to which I call your attention:

- The Sector Plan text has been streamlined to the point that the Plan fails to justify many of its recommendations. Given the importance of Master Plans as guidance documents, justification provides critical guidance when implementation challenges arise. For example, the shifting of Ennalls Avenue and the extension of Price Avenue to Amherst Avenue should be explained as such understanding enables priorities and options to be addressed. All maps, figures and tables should be cited and importance given within the Plan text. For example, the methodology, background and significance of total proposed residential and jobs in Table 1, Proposed Development and Jobs-Housing Ratio, is not clear.

Office of the Director

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- The Plan proposes to extend Price Avenue easterly from Fern Street to Amherst Avenue. However, this extension will go through the Garage 45 structure, which was not designed nor constructed to accommodate the extension of Price Avenue. Running a public street through an existing building warrants additional text to explain a rationale and justification for this proposal. Recognizing that such plans are not always feasible, an alternative should be described in the Plan.
- Not only is Westfield Mall the largest economic driver, it is the largest land owner and, presently, the biggest attractor of visitors to Wheaton. The vitality of Wheaton is closely tied to Westfield Mall. Yet, this suburban mall is in many respects disconnected with the rest of Wheaton. To encourage the transformation of the suburban mall to an urban town center with strong synergies to the rest of Wheaton, the Plan should look closely at increasing both height and density on the Westfield property while stepping down beyond the ¼ mile station boundary towards the existing communities. The proposed Westfield Mall height limitation of 75 feet and FAR could be too restrictive to permit feasible redevelopment. It is not only the largest single property in the sector plan area, it is close to Metro – making the proposed zoning a limiting factor of redevelopment opportunities on this prime site.
- The Plan should extend Priority Retail Streets to include Veirs Mill Road from Georgia Avenue to just northwest of University Blvd. and along University Blvd. to just west of Veirs Mill Road. Such an extension would be consistent with one of the four zoning goals stated on page 26 of the Plan; “Allow for concentrated specialty retail in the Core and along the three main roads.” As one of these “three main roads”, including Veirs Mill Road is consistent with the Plan’s zoning goals. As all these roads are well within walking distance of the Metro, the Veirs Mill/University intersection will be an important Wheaton gateway, further underscoring the need to include Veirs Mill Road as a priority retail street. Related to this, as retail market demand is critical, the Plan should foster flex office and rental residential space at the street level that can convert to retail space when the market allows.
- Road designations should be in conformity with community context. For certain roads, the Plan does not recognize the concept of Context Sensitivity. Several roads in existing (and planned) single family residential areas are designated as Business Streets. In other cases road segments within the existing Central Business District are designated as Residential Primary Streets. One of the primary determinants of context is the master planned land use of the properties abutting a street.
- Under the Transit section we recommend that references to bus transit include all the Bus Rapid Transit routes under study. Further, we recommend the recently completed WMATA Station Access Study be cited and that the Plan recognize the critical role of the existing and extensive bus network.
- While we support the recommendation of a civic urban park, we are concerned about the recommendation that the current Parking Lot 13 be the designated location for this public use space. The County needs to assess whether this would be in the best

interest of an overall strategy for redevelopment. Rather than focusing specifically on Parking Lot 13, the Plan should recognize the need for an urban park to be included as a part of the redevelopment plan, without reference to whether this is achieved through a single parcel or an assemblage of properties in the core area.

Enclosed with this letter is a document titled, "Executive Staff Technical Comments – Planning Board Public Hearing on Draft Wheaton Sector Plan". This document provides detailed comments resulting from a review by all Executive Branch departments with specific textual citations and notes. We hope your staff will find this input helpful in making the Plan an effective tool for the future development of Wheaton.

Yours truly,

A handwritten signature in black ink, appearing to read "David Dise", with a large, stylized flourish extending to the right.

David Dise, Director

**Executive Staff Technical Comments
Planning Board Public Hearing Draft Wheaton Sector Plan
July 2010**

Department of Economic Development

General comments

- This sector plan represents a key opportunity for Montgomery County to establish a blueprint for transit-oriented mixed-used development. The Plan should capitalize on the presence of Metro and Wheaton's role as a regional transit hub to promote high-density, high-quality growth and redevelopment that positions Wheaton as an important residential and employment anchor in the Eastern part of the County.
- A number of the maps seem to be misplaced. Suggest reviewing their placement in the text to ensure they are positioned adjacent to related narrative (there are several instances where maps precede the accompanying narrative).
- Recommend enlarging the district maps – it is difficult to differentiate the land parcels, due to the small size of the maps. Also, labeling all streets.
- Some of the maps could be collapsed/combined with others – see specifics below.
- Check consistency of capitalization – in some (most) places, bullets are not capitalized, but in others they are.

Specific comments

- *Page 7 - Wheaton's Role in the County* – identifies the I-270 corridor as the County's employment corridor. It would be more accurate to state that it is *one of* the County's major employment corridors. Also, suggest specifically noting the future development of the East County/Route 29 corridor in Silver Spring.
- *Page 9* – Suggest numbering and headlining the four overarching principles that the Plan recommends guide Wheaton's (re)development (diversity, connections, design and the environment). They get somewhat lost in the current text/bullets.
- *Page 9 - "Connecting people" bullet* – add "expanded pedestrian connections"
- *Page 11 - The Wheaton Community* – The yellow and gray shading 'slices' in the pie charts are difficult to distinguish. For example, it's not clear from my print-out whether 37% have a graduate degree and 11% have an associate or trade school degree, or the other way round. Same with bachelor's and high school degrees.
- *Page 16 - Revitalization Strategy* section – states that 'In the short term, publicly owned land should be used to create an atmosphere of regeneration. In the long term, when the market is ready, publicly owned land should be used for public/private partnerships.' The County/WMATA partnership appears to be proceeding and should result in revitalization.
- *Page 17 - Arts and Entertainment District Designation* – this designation provides additional benefits to the ones listed. The MD State Arts Council has described the benefits to selected districts as including "property tax credits for renovation of certain buildings that create live-work space for artists and/or space for arts and entertainment enterprises, an income tax subtraction modification for income

derived from artistic work sold by qualifying residing artists, an exemption from the Admissions and Amusement tax levied by an arts and entertainment enterprise, or, qualifying residing artist in a district. “

- *Page 18 – Enterprise Zone* – suggest including a brief summary of tax incentives. Here is an excerpt from the DBED web page: “Real property tax credits – Ten-year credit against local real property taxes on a portion of real property improvements. Credit is 80% the first five years, and decreases 10% annually to 30 percent in the tenth and final year. Income tax credits – the one-time \$1,000 credit per new worker. For economically disadvantaged employees, the credit is \$6,000 per employee over three years.”
- *Page 20 – Map 8 – Request for Qualification Properties* – Narrative about RFQ on Page 21 should come before the map. Suggest swapping order (and referencing the map in the text).
- *Page 21 – last paragraph, first column* – suggest eliminating third bullet “in the Core District...” – seems redundant with previous bullet.
- *Page 22 – Public Use Space Map* – precedes narrative description on page 23 – suggest swapping order.
- *Page 23 – Establishing Permanent Public Use Spaces* – there is no previous reference in the text to the CR zones.
- *Page 23* – Suggest eliminating/modifying recommendation that “The Department of Parks should own and operate this (major civic) space as an urban park.” Better to maintain flexibility and consider alternate management options as appropriate.
- *Page 24 – Map 10 - Land Use Concept map* – can this be merged with Map 12 on page 28 - Proposed Land Use Concept?
- *Pages 26-27 – Proposed Land Use and Zoning* – Suggest making the background on Wheaton’s existing zoning shorter – I don’t think this much detail is needed. And I think the discussion about what the CR zones allow and the recommendation to replace CBD and other existing zoning with the CR zone on page 27 needs to be moved forward emphasized. Also, the discussion in the Implementation section on page 63 about the advantages and benefits of the CR zone could be merged into the *Proposed Land Use and Zoning* section.
- *Page 26 – Last paragraph* - ‘The other locations in the region have benefited...’ – suggest moving this to the ‘Issues’ section on pp 15-16.
- *Page 27 – second paragraph, second sentence* – ‘The CR Zones do not require a lengthy approval process’ – has this been demonstrated yet? It may be better to structure this sentence to read, “The CR zones are structured to be a shorter, more efficient approval process.”
- *Page 29 – Map 13 – Proposed Density/Maximum FAR* – Suggest showing (existing) densities in residential neighborhoods that fall within the Plan area.
- *Page 30 – Map 14 – Proposed Maximum Building Heights* – Why is Westfield Mall site limited to 75 feet? This limits redevelopment opportunities. I recognize the sensitivities to the adjoining residential neighborhoods, but couldn’t the inner core of the mall and the area abutting Veirs Mill Road have higher height/FAR limits? This would help encourage redevelopment.

- *Page 31 – Density and Building Height* – suggest identifying the buildings in the pictures, indicating their densities to illustrate. Also, suggest that maps 13 and 14 on pages 29 – 30 follow the narrative rather than come before it.
- *Page 33 – The Core District* – suggest clearly marking the maps in Figure 1 ‘Existing Zoning’ and ‘Proposed Zoning’ and labeling *all* street names that are within the district. These same suggestions apply for the sections on the other four districts. Also, should CR zoning color code be labeled since the existing zoning is?
- *Page 36 – Block Q* – what is the reason for maintaining the WTOP site’s R-90 zoning?
- *Page 37 – Westfield District* – suggest re-evaluating recommended density and height for Westfield Mall property to determine if higher density/height limits may be feasible for some/all of the site. This is the largest single property in the sector plan area *and* is close to Metro - the proposed zoning limits redevelopment opportunities on this prime site.
- *Page 42 – Map 16 – Existing and Proposed Street Network* – can all streets in classification table be labeled by name?
- *Page 48 – Transit* – 30 percent non-auto driver mode share goal seems low compared to other Metro-served CBDs (Silver Spring, Bethesda) – and is only 5 percent higher than Germantown.
- *Page 50 – Health* – move paragraph beginning ‘Encourage all new building construction..’ to Energy section on page 51.
- *Page 54 – Map 20 - Existing Community Facilities* – can this be combined with Map 21 (page 56) – Existing and Proposed Parks and moved after the narrative discussion about Community Facilities and Public Park Facilities on pages 55 and 58? Map 23 on page 61 – Historic Resource – could also be combined with this.
- *Page 59 – Regional Services Center* – no mention of fact this property was included in County/WMATA RFQ issued last spring (and wasn’t it one of the sites that actually got bids?).
- *Page 62 – Map 24 - Proposed Zoning* – suggest moving this to the ‘Proposed Zoning and Land Use’ section on pages 26-27.
- *Page 63 – Implementation* – see above notes about combining some of this section into the ‘Proposed Zoning and Land Use’ section on pages 26-27.

Department of Environmental Protection

General Comment

- **Solid Waste & Recycling Infrastructure** - The Plan does not mention solid waste and recycling requirements for future developments and for retrofits. The Division of Solid Waste Services has worked extensively in Wheaton and other CBDs to coordinate and consolidate solid waste management and recycling services and infrastructure in order to make better use of limited space, reduce costs to business, reduce truck traffic (and therefore energy consumption and air emissions). The Plan could include language to lay the groundwork for adequate solid waste management infrastructure in the CBD.

Specific Comments

- Page 50 - Natural Systems - As a part of raising awareness of water flow through increased visibility, we recommend including a commitment to daylighting streams when possible during the redevelopment process.
- Page 50 - Natural Systems - It is not clear how “encouraging small properties to redevelop together to facilitate shared use” minimizes and mitigates impervious surfaces. Clarification of what is being shared would make this clearer.

Department of Fire and Rescue Services

Specific Comments

- Pages 9, 41, 49 - “street trees,” “tree canopy,” “greater tree canopy”- Size, height, and spacing of street trees must allow adequate access for the positioning of aerial ladders and ground ladders to building windows, particularly where buildings are over 3 stories in height. Poorly placed trees greatly restrict aerial apparatus operations at taller buildings. Tree location and density must be strategically planned to minimize these conflicts.
- Page 18 – (Urban Design Guidelines) “Encouraging Street Level Activity” - Reference is made to urban design guidelines. Advance provision of those guidelines with meaningful opportunity to comment and work with County agencies on their development will be helpful.
- Pages 27, 31 - “increased density,” “existing infrastructure can support substantially more development” - Increased building and population density translates to increased volume of emergency incidents to which MCFRS must respond as well as longer response time caused by increased vehicular traffic traveling at slower speeds and greater volume of pedestrian traffic. To meet these increased service demands and inherent response time delays, additional fire-rescue resources will undoubtedly be required over time in and around the Wheaton CBD, and the potential need for additional facilities (i.e., stations) will need to be evaluated on a recurring basis.
- Page 39 – (Fire-Rescue Facilities) “County fire and rescue station” under the Block V heading - The reference to a “County fire and rescue station” would be more accurately referenced as merely a “fire and rescue station” without the word “County.” [Note: The station will be co-owned by the Wheaton Volunteer Rescue Squad and Montgomery County.]
- Pages 41, 44 – (Street Design and Reduced Traffic Speeds to Accommodate Pedestrian Movement) “Reduce target speeds to 30 mph on major highways....,” “reduce target speeds, “slower target speeds,” street closures for events -Reducing traffic speeds in the Wheaton CBD will slow response time of emergency vehicles due to traffic congestion. Major highways such as University Boulevard, Veirs Mill Road, and Georgia Avenue are used frequently by fire-rescue vehicles. Reducing the speed limit on these roads will increase existing traffic congestion in and around the Wheaton CBD, adversely affecting response time of fire-rescue vehicles. Periodic street closures to accommodate open-air markets, outdoor dining, and special events (as proposed in the sector plan) would prevent access

by fire-rescue vehicles to nearby buildings and delay the response of fire-rescue vehicles as they detour around closed streets.

- Page 41 - “consider roundabouts to control traffic” - Roundabouts slow responding fire-rescue vehicles more so than smaller vehicles (e.g., sedans, small SUVs, small pickup trucks) used by the majority of other motorists. For this reason, inclusion of roundabouts is not favored by MCFRS. If any are to be included in the CBD, they must be designed to accommodate easy traversing by fire-rescue vehicles to minimize delays for essential life and property saving efforts.
- Pages 41, 49 - “Provide on-street parking on as many streets as possible ...” “Encourage short term on-street parking within the CBD” - Recent Planning Department practice, in an effort to encourage on-street parking, has allowed on-street parking to count toward required parking minimums. Street width must accommodate all activities planned and necessary. If on-street parking is envisioned, it must be on rights-of-way that are wide enough that parked cars will not impede emergency vehicle access.
- Page 49 - “incorporating trees into stormwater management and roof and terrace plantings” - Previous discussions of green roofs in plans described use of low, drought resistant grasses. The newer proposal of planting trees on roof-tops would present a long-term maintenance concern and may require changes to the Life Safety Code in order to provide firefighting water supply directly to roof-tops. Trees could catch fire due to lightning strikes or nearby roof-mounted HVAC or electrical equipment, so the potential for tree fires on roofs would need to be addressed.
- Page 59 - Paragraph concerning Fire Station 18 - Need to add the following narrative to the end of the paragraph: “Also within the early time frame of this Sector Plan, the Wheaton Volunteer Rescue Squad (Station 42) will be relocated from its Grandview Avenue location to the corner of Georgia and Arcola Avenues. The new rescue station will be approximately 28,000 square feet and have four bays to accommodate a fleet of ambulances, medic units, and heavy rescue apparatus. The new locations of Stations 18 and 42 are necessary and will facilitate adequate response coverage throughout the Wheaton area.”
- Page 60 - “Public Safety” - This heading and paragraph should not use “public safety” to refer solely to the Police Department, as public safety encompasses services provided by Police, Fire-Rescue, Sheriff, Corrections, and Emergency Management agencies in Montgomery County. Use of “police” or “law enforcement” would be more appropriate terminology than would “public safety” in this paragraph.

Department of General Services

General Comments

- While Wheaton is not currently an office market, having sufficient zoning in place, sets the stage for such development as environmental and transportation

concerns make Smart Growth more attractive. We concur with the removal of the Overlay Zone as its removal is critical to redevelopment.

- The Sector Plan text has been streamlined to the point that the Plan fails to justify many of its recommendations. Given the importance of Master Plans as guidance documents, justification provides critical guidance when implementation challenges arise.
- Not only is Westfield Mall the largest economic driver, it is the largest land owner and the biggest attractor for people to come to Wheaton. The vitality of Wheaton is closely tied to Westfield Mall. To encourage the transformation of this current suburban mall to an urban town center with strong synergies to the rest of Wheaton, the Plan should look closely at further increasing both height and density on the Westfield property.

Specific Comments

- Page 9 - Table 1, Proposed Development and Jobs-Housing Ratio - Text should be added to the Plan explaining the significance of the “proposed net” residential units and jobs. Are these numbers build-out projections or are these likely limits during the life of the Plan? The Plan should state assumptions behind these projections.
- Page 18 - Map 7, Priority Retail Street - Include Veirs Mill Road and the intersection of University Blvd and Veirs Mill Road. Under the “Encouraging Street Level Activity” text, the Plan should foster flex office and rental residential space at the street level that can convert to retail space when the market allows.
- Page 29 - Map 13 Proposed Density/Maximum FAR - Increase Westfield density within .25 mile of the Metro Station so that it matches Westfield density along Veirs Mill Road.
- Page 14 - Map 14, Proposed Maximum Building Heights - Increase Westfield height within .25 miles of the Metro Station so that it matches Westfield height limitation along Veirs Mill Road.
- Page 36 - Consider increasing zoning for the non-historic portion of the WTOP property.
- Page 41 - The Street Network - Provide a boulevard cross section so as to provide a better indication of this concept.
- Page 47 - Map 18, Existing and Proposed Transit Services - Add additional Bus Rapid Transit routes as being proposed by the Department of Transportation study.
- Page 49 - Table 5, Existing Parking Supply and Charges - Make clear that garage spaces are County space and do not include the 977 spaces available in the WMATA garage parking. The WMATA garage currently charges a \$4 daily fee upon entry from 5 a.m. to 2 p.m. There is no charge after 2 p.m. “Garage” is misspelled in the table.
- Page 57 - Map 22 Existing and Proposed Trails - ICC trail should be added to the legend. Do those information kiosks exist? We are not aware of any of these kiosks, including the one in downtown Wheaton.

- Page 62 - Proposed Zoning - Increase Westfield zoning within .25 mile of the Metro Station.

Department of Health and Human Services

General comment

- Consideration of the health implications of community design issues (such as appears on page 50) is a welcome addition to this and any planning documents.

Specific comments

- Page 59 - operating out of the Regional Services Center - The following should be removed: “multicultural Mental Health/Adult Behavioral Health” (duplicative) and “Health Promotion and Substance Abuse Prevention” (unfunded). The following should be added: “Women’s Cancer Control”.

Department of Housing and Community Affairs

General comments

- DHCA supports the Sector Plan’s proposals for significant numbers of additional housing units, including MPDUs and Workforce Housing Units, in Wheaton.
- While the CR Zone is new and has not yet been tested, DHCA believes that the CR Zone provides strong incentives to develop affordable housing beyond minimum requirements.
- DHCA recommends the final CR Zone Guidelines include detailed examples showing the methods for calculating incentive density (both the number of units and the additional floor area) for MPDUs and Workforce Housing.
- DHCA recommends that the Sector Plan include a Housing section, similar to the current sections on Mobility, Environment, and Community Facilities. The availability and location of housing for all populations is a top priority, and is a key factor in supporting sustainable development.

Department of Public Libraries

General comments

- While the Wheaton Library is outside the CBD and Vicinity Sector Plan area, it is mentioned in the Community Facilities section of the Public Hearing draft with the map on page 54 and the Libraries paragraph on page 59.
- We no longer identify our libraries by size (regional or community) so the name should read Wheaton Library.

Specific Comment

- The statistics provided for foot traffic in the description are old and the library is no longer the second busiest in the Department. The following substitute text is recommended for what is in the draft:

The Wheaton Library is located at the corner of Georgia and Arcola Avenues. The library is one of the Department's busiest branches with over 600,000 items circulated a year and more than 425,000 annual visits. Renovation planning and design was scheduled to begin in 2009, but the renovation project was removed from the CIP to consider relocation of the facility to the CBD. In the fall 2009 a decision was made to keep the library in its current location. The Program of Requirements for the renovation will consider needs in all service areas, including the demand for computers, WIFI, language learning programs, and service to teens and the diverse Wheaton community. Existing and future library services can accommodate new development recommended in this Plan.

Department of Transportation

General Concerns

- The Draft contains a discrepancy between a Mobility recommendation and the Proposed Land Use and Zoning scheme. On Map 16 in the Mobility chapter a segment of existing Ennalls Avenue is planned to be “Abandoned”. However, there is no text in the Mobility chapter providing a rationale and justification for this proposal. There is no recognition of this abandonment (or of the accompanying planned realignment of Ennalls Avenue) in any of the figures or text in the Land Use chapter. This disconnect will result in implementation difficulties at the time of redevelopment. It would be helpful for the plan to provide a consistent proposal for the relocation of Ennalls Avenue within The Core District (including its impact on existing businesses in Block D) with conforming provisions, explanation and justification throughout the pertinent chapters of the Plan.
- The Draft provides for several roads in existing (and planned) single family residential areas to be designated as Business Streets. DOT does not believe that this designation is context sensitive to the nature of the single family residential community. In other cases road segments within the existing Central Business District are designated as Residential Primary Streets. One of the primary determinants of context is the master planned land use of the properties abutting a street. Therefore, segments of the following roads are incorrectly classified and need to be corrected on Map 16 and Table 2:
 - Amherst Avenue
 - Grandview Avenue
 - Prichard Road
 - Reedie Drive

- Blueridge Avenue is designated as a Residential Primary Street from “Elkins” (sic – Elkin) Street to Nairn Farmhouse Court in Table 2. However, it is shown as a discontinuous street, segmented by Pedestrian Connections, on Map 16. There is no text to explain this disconnect between map and table. The Plan needs to present a consistent vision for this segment of Blueridge Avenue.
- Due to their short block lengths and higher volumes of traffic carried to, from, and around the Mall, Business Streets B-23, B-24, B-25, B-26, and the westernmost segments of B-19 and B-22 need to be 4 lanes; otherwise as currently used, holiday shopping will result in congestion.
- Bus Rapid Transit (BRT) is incompletely dealt with in the Draft. Although it shows BRT as being “Proposed” on Veirs Mill Road on Map 18, and assumes that BRT will be operated on Veirs Mill Road in the text on pages 41 and 48, it fails to note the County BRT Study currently being conducted by MCDOT that is expected to identify a network of BRT routes to be considered for implementation. This study is examining University Boulevard (MD 193) and Georgia Avenue (MD 97) as potential BRT corridors in addition to Veirs Mill Road (MD 586). This Plan should acknowledge all three highways as potential BRT corridors.
- In addition, WMATA just completed a draft Study that examined the number of bus bays needed to accommodate the existing bus network plus potential BRT corridors. The Plan must recognize the critical importance and role of the extensive bus network including its focal point, the Wheaton Metrorail Station.
- The Draft calls for certain segments of Hickerson Drive and Elkin Street to be closed to vehicular traffic on weekends and holidays for certain special uses. This is an operational issue which is to be determined by MCDOT. MCDOT has a process in place to accomplish this type of function.
- The Draft states that “Strong transportation demand management [TDM] systems are already in place in Wheaton.” MCDOT questions this statement; while the area does have good transit accessibility and managed public parking it also has a poor Non-Auto Driver Mode Share (13% of surveyed employees working in the area) as shown in the commuter survey data.
- MCDOT’s Commuter Services office has conducted efforts to promote alternative modes but these have met with mixed results. One reason is the lack of a critical mass of office employment in Wheaton, unlike other CBDs. Most employment in Wheaton is retail and restaurant employees. Given the current lack of office employment, and the fact that this Plan states Wheaton “is not envisioned to be a major new office hub”, the success of a TDM effort in achieving the employee mode share goals this Draft establishes is questionable. This is particularly true if no formal coordinated promotion effort is undertaken by establishment and funding of a Transportation Management District (TMD).
- Bikeway G-G’ (as shown in the *Kensington Wheaton Master Plan*) is not shown on this plan draft; either show it on Map 17 and add it to Table 3, or add some text formally deleting it so there is no future confusion as to its status.
- A bikeway should be proposed for all of University Boulevard (MD 193) within the planning area (see bikeway proposed in the *Town of Kensington Sector Plan*).

- There appears to be a discrepancy between the total number of parking spaces as shown in Table 5. The top part of the Table, showing spaces by type of facility, totals to 1,464; however, the bottom part, showing spaces by length of use, totals to 1,450. Corrected numbers from MCDOT's Parking Management Division are:

Garage spaces	628
Lot spaces	428
On-Street spaces	<u>409</u>
Total spaces	1,465

Long-term spaces	886
Short-term spaces	543
Handicap spaces	<u>36</u>
Total spaces	1,465

- The Draft has a discrepancy in its treatment of Short-term parking. On page 15 Short-term parking is presented as a problem ("not conducive to one-stop shopping") while on page 49 it is listed as something to be encouraged. MCDOT's position is that Short-term parking serves a valid function in the Wheaton CBD.
- Some of the Jobs to Housing Ratio calculations are incorrect. The Existing J-H Ratio should be 5.1:1 and the Total with Proposed J-H Ratio should be 2.02:1 (which is actually closer to the target countywide ratio of 1.6 to 1 than the 2.8:1 shown in the Draft).
- The Historic Resources Section contains an inconsistency. While the text clearly states that "the environmental setting for this historic resource [31/12 WTOP Radio Transmitter] is 1.4 acres", Map 23 shows the entire 12.31 acre parcel as the "Designated Historic Site". This needs to be corrected.
- All maps showing the entire planning area must include the Sector Plan boundary. It is missing from numerous maps and hence they are incomplete.
- There are several references to the Urban Design Guidelines; it is more appropriate to reference the Context Sensitive Road standards which have already been approved by County Council.
- Any recommendations for stormwater management will need to be coordinated with the Montgomery County Department of Permitting Services.
- The Draft does not contain some elements of a comprehensive plan required under State law.
- The Draft does not contain certain "Visions" required under State law.
- The Draft proposes to extend Price Avenue easterly from Fern Street to Amherst Avenue. However, this extension will go through the Garage 45 structure. MCDOT understands that the Garage 45 parcel is included in the public land under consideration as one of the Request for Qualifications Properties. However, Garage 45 was not designed or constructed to accommodate the extension of Price Avenue. Extending Price Avenue through Garage 45 would involve complete demolition of Garage 45, unless shown otherwise by rigorous and thorough structural and operational analysis. Further, the Draft contains text

that states, “If Parking Lot District land is redeveloped, the County must be reimbursed for the cost of the land and the current and future parking needs must be met.” Nevertheless, running a public street through an existing building requires additional text to explain a rationale and justification for this proposal. Also, a backup option is needed to be described in the Plan, in case Price Avenue cannot be extended due to the infeasibility of reconstructing the garage structure. More text explaining this proposal, and its backup option, is needed in the “Long Term” section as well as the “Mobility” chapter.

Specific Comments

- Page 2 - This Plan amends additional functional and countywide plans other than those currently listed in the Abstract; a list of all amended functional and countywide plans needs to be included.
- Page 4 - The County Capital Improvements Program and State Consolidated Transportation Program starts on p. 63 (not 64)
- Page 7 - Revise the first sentence of the second paragraph under “Wheaton’s Role in the County to state, “A significant amount of traffic moves *west* through Wheaton to and from the I-270 Corridor, . . .
 - revise the last sentence of the same paragraph to state, “When Wheaton develops more fully . . . a full set of services, employment, and housing opportunities for the eastern half of the County.
- Page 8 - Show Amherst Avenue as CBD Circulation (not Primary Pedestrian and Bicycle) on Map 2
- Page 9 - Correct Table 1 to show the Existing J-H Ratio as 5.1:1 (not 4.25:1) and the Total with Proposed J-H Ratio as 2.02:1 (not 2.8:1)
 - revise the second sentence in the first bullet to state, “This Plan capitalizes on Wheaton’s diversity by encouraging *diversity in a variety of* businesses and housing.”
 - revise the fourth bullet to state, The natural and built environment can be made more sustainable *hospitable* through . . .”
- Page 11 - Add a comma between Japan and Vietnam in the first paragraph
- Page 15 - Correct the ninth bullet to state, “Wheaton Veterans Memorial Urban Park is at the edge of the *Plan area* Central Business District”
 - the tenth bullet, regarding Short-term parking is at odds with text on p. 49 (see General Concerns)
 - revise the eleventh bullet to state, “Many buildings need improvements *upgrading, façade treatments*
- Page 16 - Revise the last sentence in the first paragraph to state, “Finally, . . . interaction through *activate* safe streets and around-the-clock activities.”
- Page 19 - Add a final bullet under Developing a Nighttime Economy stating, “Crime Prevention Through Environmental Design (CPTED) Reviews should be incorporated into redevelopment efforts”
- Page 24 - Correct the title of Map 10 to be Existing Land Use *Concept*
- Page 29 - Show the proposed (not existing) street network on Map 13
- Page 30 - Show the proposed (not existing) street network on Map 14

- Page 33 - This section on the Core District needs to add text pertaining to the abandonment of existing Ennalls Avenue, the proposed relocation of Ennalls Avenue, the impact of the relocation on existing businesses, and the impact of both on the proposed zoning
 - show the proposed (not existing) street network on the Proposed Zoning map in Figure 1
- Page 34 - Correct the residential line in Block HH of the Proposed Zoning map in Figure 2 to show R 1.5 (not R 1) for consistency with the text on p. 35 and Map 24 on p. 62.
 - show the proposed (not existing) street network on the Proposed Zoning map in Figure 2
- Page 35 - Correct the text regarding Block K to delete all references to multi-family housing units, R-20 zoning, and Parcel N46; Parcel N46 is not part of the Price District so the zoning and land uses on it should not be referenced, for consistency with Figure 2
- Page 36 - Correct the text regarding Block P to state, “Block P is zoned R-20 and R-30 to the north and CBD-2 to the south.”
 - show the proposed (not existing) street network on the Proposed Zoning map in Figure 3
- Page 37 - Show the proposed (not existing) street network on the Proposed Zoning map in Figure 4
- Page 39 - Correct the text regarding Block W to delete all references to R-60 zoning; the northern part of the block is not part of the Kensington View/Wheaton Hills District so the zoning on it should not be referenced, for consistency with Figure 5
 - revise the last sentence in the first paragraph under Existing Neighborhoods Surrounding the Districts to state, “Redevelopment in these neighborhoods should maintain existing scale and character blend with existing conditions and should not introduce mixed-use zoning.”
- Page 40 - Move the box dealing with NADMS to p. 48 so it is proximate to its related text and Table 4
 - provide some explanatory text for the travel mode chart in the left column; is this all travel or only journey to work?; is it travel by residents of the named places or travel by residents and commuters to the places?; what is the significance of the charts data?
 - explain the terms Policy Area Mobility Review and Relative Arterial Mobility either on this page or in a Glossary added to the Plan
 - revise the second sentence in the first paragraph under Approach and Network Integrity to state, “By carefully . . . in the CBD where design, safety, environmental, and community objectives require a multifaceted approach to placemaking.”
- Page 41 - Delete the last sentence of the second bullet under The Street Network (see General Concerns regarding BRT)

- revise the third bullet under The Street Network to comprehensively deal with right-of-way and bikeway issues on University Boulevard (MD 193)
- delete the fifth bullet under The Street Network; Target Speeds are an engineering, not planning, issue
- delete the second bullet under Pedestrian Circulation (see General Concerns)
- Page 42 - Change symbol for Grandview Avenue from MD 193 to Blueridge Avenue to Business (not Residential Primary) for context sensitivity
 - change symbol for Blueridge Avenue from Amherst Avenue to Bucknell Dr. and from Taber St. to Nairn Rd. to Residential Primary Proposed (not Pedestrian Connections Existing) for consistency with Table 2
 - show symbol for Elkin Street from Price Av. to MD 193 as Local Street Existing
 - change symbol for Reddie Drive from Amherst Av. to Dodson Ln. to Residential Primary (not Business) for context sensitivity
 - change symbol for Pritchard Road from Amherst Av. to Bucknell Dr. to Residential Primary (not Business) for context sensitivity
 - change symbol for Amherst Avenue adjacent to Parcel N46 to Residential Primary (not Business) for context sensitivity
 - end the symbol for Primary Residential at St. Margarets Way for Douglas Avenue (P-9) and delete the P-35 designation
 - show the Sector Plan boundary on Map 16
- Page 43 - Reevaluate the minimum master planned right-of-way widths for all Major Highways segments, given their BRT and bikeway potentials, as 150'
 - Amherst Avenue is "From" Parcel N46 (not *Windham Ln.*)
 - Ennalls Avenue needs to be 4 lanes and 80' right-of-way from Wheaton Plaza Ring Road to Veirs Mill Rd.
 - Grandview Avenue is "To" Blueridge Ave. (not *University Blvd.*)
 - Prichard Road is "To" Amherst Ave. (not *Bucknell Dr.*)
 - delete the entire line for Reddie Drive "From" Amherst Ave. "To" Dodson Ln.; this should be a Residential, not *Business*, Street
 - the number of lanes for the last line of B-22 and all of B-25, B-23, B-24, and B-26 need to be 4 lanes and 80' right-of-way
- Page 44 - Delete the top line regarding Southeast Mall Entrance; it is duplicative
 - correct spelling of Elkin St. on Blueridge Avenue line
 - delete entire P-35 line; Douglas Avenue should be combined with Windham Lane on the P-9 line for consistency with the *Kensington-Wheaton Master Plan*
 - Grandview Avenue is "From" Blueridge Ave. (not *University Blvd.*)
 - Prichard Road is "From" Amherst Ave. (not *Bucknell Dr.*)
 - Douglas Avenue/Windham Lane is "From" St. Margaret's Way (not *Georgia Ave.*)
 - add a line for Reddie Drive "From" Amherst Ave. "To" Dodson Ln. as a Residential Primary Street

- shouldn't the third sub-bullet under Bikeway Network refer to park facilities in western (not *eastern*) Wheaton?
- revise the first sentence of the second bullet under Bikeway Network to state, "Request the State to designate the Plan area as a Bicycle and Pedestrian Priority Area." The State needs to be consulted since it, not the County, has the authority to make this designation.
- revise the third bullet under Bikeway Network to comprehensively deal with bikeway issues on University Boulevard (MD 193)
- the County has no authority to develop a bike station at the Wheaton Metro Station and bike stations are costly to construct; therefore, a specified land area should be identified in the Plan for the bike station. The Plan should show how it is feasible to incorporate such a facility into the Metro Station area, or show an alternative facility on nearby land dedicated for this purpose.
- Page 45 - Extend symbol for Dual Bikeway on MD 193 from Amherst Av. to MD 97 for consistency with *Countywide Bikeways Functional Master Plan*
 - designate MD 193 from MD 97 to Drumm Av. as a bikeway similar to the designation in the pending *Town of Kensington and Vicinity Sector Plan a*
 - either delete PB-8 on Franwall Avenue, or add a listing for it to Table 3
 - add an SR-20 designation to Amherst Avenue south of Reddie Dr.
 - correct the alignment of PB-7 to show it going via Douglas Avenue
 - either delete PB-30 from McComas Ave., or add a listing for it to Table 3
 - either delete PB-33 from MD 586, or add a listing for it to Table 3
 - add a bikeway from East Ave. to MD 586 via College View Dr.
 - add a bikeway from Galt Ave. to Grandview Ave. via Dawson Ave.
 - add a bikeway from Fennimore Rd to MD 586 via Galt Ave.
 - add a bikeway from Blueridge Ave. to Arcola Ave. via Nairn Rd.
 - designate the entire Wheaton Plaza Ring Road as a shared road bikeway
 - continue Bikeway SR-20 east to MD 193 via Reddie Dr.
 - continue Bikeway SP-77 west to Dawson Ave. via Blueridge Ave.
 - show the Sector Plan boundary on Map 17
- Page 46 - Revise Table 3 in accordance with all comments on Map 17 (p. 45)
- Page 47 - Either show all potential BRT alignments, or none
 - show the Sector Plan boundary on Map 18
- Page 48 - Delete the first sentence of the first bullet under Transit (see General Concerns regarding BRT)
- Page 49 - Address the discrepancy between the total number of parking spaces as shown in Table 5 (see General Concerns)
 - the first bullet, regarding Short-term parking is at odds with text on p. 15 (see General Concerns)
- Page 50 - Correct the first sentence under Health to state, "A well designed community can improve the well-being . . ."

- delete the fourth, fifth, and eleventh bullets under Health; these appear to have nothing to do with master-planning
- Page 51 - Spell out “American Society of Heating, Refrigerating, and Air Conditioning Engineers” prior to the first use of the acronym ASHRAE
- Page 54 - Show the former elementary school site on Upton Drive for consistency with the text on p. 59
 - show the Sector Plan boundary on Map 20
- Page 56 - Label the names of the existing parks
 - show the Sector Plan boundary on Map 21
- Page 57 - Delete the dropped master plan alignment for the ICC through Rock Creek SVP, and the Midcounty Highway extension since it is not part of the ICC
- Page 58 - Correct the first sentence in the first bullet under Public Park Facilities to state, “If Wheaton Veterans Urban Park (Veterans Park) is not . . .”
 - correct the third sentence in the fourth bullet under Public Park Facilities to state, “The Department of Parks *Department* should . . .”
- Page 59 - Add text to the Fire, Rescue, and Emergency Medical Services section regarding the relocation of the Wheaton Volunteer Rescue Squad facility
- Page 60 - Revise the last bullet on the page to state, “Any redevelopment of the 12.31 acre WTOP site must . . .”
- Page 61 - Reduce the pink shaded area on the WTOP parcel to only show the 1.4 acre historic Environmental Setting, not the entire 12.31 acre parcel
 - show the Sector Plan boundary on Map 23
- Page 62 - Show the proposed (not existing) street network on Map 24
- Page 63 - Revise the second bullet under Public Benefits in the CR Zones to state, “through-block pedestrian connections”

Mid-County Regional Services Center

General comments

- The RSC is enthusiastic about the Wheaton Sector plan. The Sector Plan's recommendation of the CR Zone to replace CBD Zoning will encourage mixed-use development and give us greater flexibility. Elimination of the Overlay Zone is important to the success of the Plan.
- The Draft Plan (page 23) recommends that "when redevelopment occurs as a part of a public private partnership ... the department of Parks should own and operate [Parking Lot 13] as an urban park." The plan should not be specific as to Lot 13 and instead recommend that when there is an assemblage of properties for redevelopment in the Core that an urban park be provided in connection with the redevelopment.
- The Draft Plan indicates the need for additional use of public properties -prior to further redevelopment -for festivals and performances. We agree that is desirable, however, in the current fiscal environment, this may create an unrealistic expectation by Wheaton residents and businesses.
- Finally, while a 30% non-auto goal for the CBD is laudable, it is important to note that Wheaton does not have a Transportation Management District (TMD). It

would be necessary to create a TMD to achieve that goal, which would obligate County resources.

Office of Management and Budget

Specific comments

- Page 11 - Educational Attainment Graph - There is no color distinction between the Associate or Trade School and the Graduate, Professional or Doctoral Degree categories.
- Page 19 - 2nd bullet under Existing Programs Should Consider - Should read "...jointly by the County, small businesses...."
- Page 40 - Mobility Chart - There is no color distinction between Public Transit/Rail and Walk/bike/other categories.